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13 *Attorneys for Defendants Hewlett-Packard Company*

14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA

16 IN RE HEWLETT-PACKARD COMPANY)
17 SHAREHOLDER DERIVATIVE LITIGATION)

MASTER FILE NO.: 12-CV-6003 CRB

18 _____)
19 This Document Relates To: All Actions)

20) **DECLARATION OF MARC**
21) **WOLINSKY IN SUPPORT OF**
22) **HEWLETT PACKARD'S**
23) **ADMINISTRATIVE MOTION TO**
24) **SEAL**

25) Courtroom: Courtroom 6, 17th Floor
26) Judge: Hon. Charles R. Breyer
27)
28)

DECLARATION OF MARC WOLINSKY

I, Marc Wolinsky, declare as follows:

1. I am an attorney with the law firm Wachtell, Lipton, Rosen & Katz, which represents Hewlett Packard Company in this lawsuit. I respectfully submit this declaration in support of HP's Administrative Motion to file under seal Exhibits 2-6 to the administrative motion.

2. On April 10, 2015, Sushovan Hussain renewed his motion to intervene in this action to challenge the entry of a complete bar order and judgment credit. Dkt. 333. HP seeks leave of the Court to submit certain documents that should be considered in deciding Hussain's motion to intervene under seal to maintain the confidentiality afforded to the documents under English procedure.

3. There is good cause to file exhibits 2, 3, 4 and 5 under seal given the short duration in which the document would be nonpublic, and the interest in affording respect to the English Rules where appropriate.

4. Attached as Exhibit 1 to this declaration is a redacted version of HP's Memorandum in Opposition to Hussain's Renewed Motion to Intervene.

5. Attached as Exhibit 2 to this declaration is an unredacted version of HP's Memorandum in Opposition to Hussain's Renewed Motion to Intervene.

6. Attached as Exhibit 3 to this declaration is a true and correct copy of Exhibit 3 to HP's Memorandum of Points and Authorities Opposing Hussain's Motion to Intervene.

7. Attached as Exhibit 4 to this declaration is a true and correct copy of Exhibit 4 to HP's Memorandum of Points and Authorities Opposing Hussain's Motion to Intervene.

8. Attached as Exhibit 5 to this declaration is a true and correct copy of a confidential letter sent on April 20, 2015 from Simmons & Simmons LLP to Travers Smith LLP.

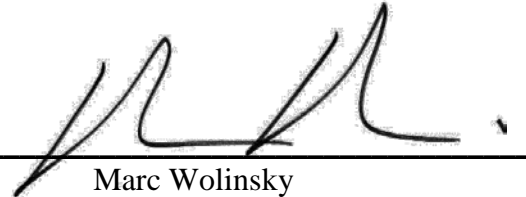
9. Attached as Exhibit 6 to this declaration is a true and correct copy of a Compromise Agreement between Sushovan Hussain and Autonomy Systems Limited dated May 10, 2012. HP has no objection to the agreement becoming public. In his response to this motion,

1 Hussain, who negotiated the agreement behind HP's back, may provide the Court with a basis for
2 maintaining the agreement under seal.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on this 29th day of April, 2015.

6
7
8 By: _____


Marc Wolinsky